

**THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

***In re* Application of KARAM SALAH AL
DIN AWNI AL SADEQ and STOKOE
PARTNERSHIP SOLICITORS for an
Order Under 28 U.S.C. § 1782 to Conduct
Discovery for Use in Foreign Proceedings.**

Misc. Civil Action No.

**[PROPOSED] ORDER GRANTING APPLICATION FOR JUDICIAL
ASSISTANCE IN OBTAINING EVIDENCE IN THIS DISTRICT FOR
USE IN FOREIGN PROCEEDINGS PURSUANT TO 28 U.S.C. § 1782**

This matter comes before the Court on the *ex parte* Application of Karam Salah Al Din Awni Al Sadeq (“Mr. Al Sadeq”) and Stokoe Partnership Solicitors (“Stokoe”, and together with Mr. Al Sadeq, the “Applicants”), for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery by the Issuance of Subpoenas (the “Application”), which seek information, documents, and materials in connection with civil proceedings initiated by the Applicants and currently pending in the High Court of Justice of England and Wales, Queen’s Bench Division captioned: *Karam Salah Al Din Awni Al Sadeq v. Dechert, LLP, Neil Gerrard, David Hughes, and Caroline Black*, Claim No. QB-2020-000322, and *Stokoe Partnership Solicitors v. Mr. Patrick Tristram Finucane Grayson, Grayson + Co Limited, Mr. Stuart Robert Page, and Page Corporate Investigations Limited*, Claim No., QB-2020-002492 (collectively, the “Foreign Proceedings”).

The Court, having considered the Application, the Memorandum of Law in Support of the Application, and the Declarations of Mark W. Merritt and Haralambos Tsiattalou in Support of the Application, and good cause appearing, it is hereby ordered that:

1. The Application is **GRANTED**.
2. Applicants are hereby granted leave to issue the Subpoenas for information, documents, and materials, in substantially the same form attached as Exhibit A and Exhibit B to the Declaration of Mark W. Merritt, upon each of Nicholas Del Rosso and Vital Management Services Inc.

ORDERED this ____ day of _____, 2021.

UNITED STATES DISTRICT JUDGE